



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
841 CHESTNUT BUILDING
PHILADELPHIA, PENNSYLVANIA 19107

November 12, 1991

To: Bob Davis

From: Frank Vavra *FV*

Subject: Hunterstown Road Site - Phthalates in Middle Stream

During the phase II RI, the middle stream samples had elevated phthalate levels that produced an ecological hazard index level of 10 for soil/benthic invertebrates. One sample had about 4 ppm and two downstream samples had about 1 ppm of phthalates. Some metals such as zinc, copper and lead were elevated but do not appear to be a threat to human health or the stream ecology. The phthalate and metals contamination appear to be limited to the site. Based on our site inspection on 10/22/91, you agreed with Westinghouse that this stream is an intermittent stream.

We asked Westinghouse to take and analyze some additional samples of the middle stream for phthalates. Westinghouse's contractor took the samples, but noted the large extent of weathered plastic filter cloth that had been installed during the removal actions to prevent erosion and transport of contaminants. The samples that EPA was requiring would be taken from sediment that had been over or under this cloth. Westinghouse asserted that the phthalates were probably due to the leaching of plasticizer from the plastic cloth and did not agree that additional sampling was appropriate or necessary.

To gain a better perspective, I reviewed the proposed MCLs for phthalates in the July 25, 1990 federal register and discovered some surprising facts. These compounds have very widespread uses and are in many plastics that we are routinely in contact with. Phthalates volatilize from car interior plastics and typical ambient air concentrations have been reported between .2 and 20 mg/cubic meter of air. Leaching from plastic food wraps and water pipes is a major uncontrolled exposure pathway. Levels of phthalates in food stored in plastic wrap have been reported as high as 68 ppm. The incremental risk to human health from the phthalates in the stream (4 ppm) are small compared to the typical exposures in normal life. Ecological effects can be different, and I asked you to review the data again. You discussed this issue with Cindy Rice of the U.S Fish and Wildlife Service. You then informed me that Cindy Rice indicated that additional data would not be necessary at this time and that you concurred with this opinion.

I have made the decision that no additional sampling/analysis is necessary at this time. After the Remedial Action it will be appropriate to test this stream to confirm that it has not been degraded by site activities. Thank you for your cooperation.

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